

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, *et al.*,

Defendants.

DAILY NEWS, *et al.*,

Plaintiffs,

v.

MICROSOFT CORPORATION, *et al.*,

Defendants.

THE CENTER FOR INVESTIGATIVE
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., *et al.*,

Defendants.

Case No. 1:23-cv-11195-SHS-OTW
Case No. 1:24-cv-3285-SHS-OTW
Case No. 1:24-cv-04872-SHS-OTW

Hon. Sidney H. Stein

**DECLARATION OF MICHAEL S. KWUN
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

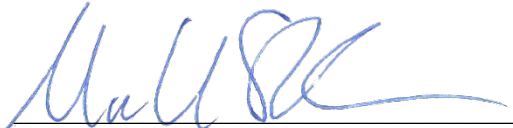
I, Michael S. Kwun, pursuant to 28 U.S.C § 1746, declare under penalty of perjury as follows:

1. I am a partner of the law firm of Kwun Bhansali Lazarus LLP.
2. I submit this declaration in support of my Motion to Admit Counsel Pro Hac Vice in the above-captioned matters.
3. I have been a member in good standing of the Bar of the State of California since December 2, 1998.
4. I attach a Certificate of Good Standing from the Supreme Court of the State of California, which was issued within thirty days of this filing, as Exhibit A to my Motion to Admit Counsel Pro Hac Vice.
5. I have never been convicted of a felony or been the subject of any criminal conviction.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
7. I have never been the subject of a disciplinary sanction and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel Pro Hac Vice in this one case on behalf of Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 20, 2025


Michael S. Kwun